## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

AMANDA DAVID	)	
Plaintiff, v.	)	Case No.: 3:24-cv-699 (DNH/ML)
ROBERT WHITTAKER, JR.	ý	
Defendant	)	
DEFENDA	NT ROBERT V	VHITTAKER, JR.'S

DEFENDANT ROBERT WHITTAKER, JR.'S UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO FILE RESPONSIVE PLEADINGS TO PLAINTIFF'S COMPLAINT

Defendant Robert Whittaker, Jr. respectfully moves this Court to extend his deadline to file pleadings in response to the Complaint filed by Amanda David. (*See generally*, Dkt. 1). In support, Defendant Whittaker shows:

- 1. On May 23, 2024, Plaintiff filed the Complaint against Defendant.
- 2. On May 28, 2024, Defendant was served with copies of the Summons and Complaint, meaning Defendant's current deadline to file responsive pleadings was June 18, 2024.
- 3. Today, Defendant moves this Court to extend his response deadline by 17 days (i.e., until Friday, July 5, 2024).
- 4. This Motion is made in good faith, not for the purpose of delay, and in cooperation with Plaintiff's counsel who did not object to Defendant's request for a deadline extension to July 5, 2024.
- 5. No party will be prejudiced by extending Defendant's responsive-pleading deadline from June 18, 2024 to July 5, 2024.

6. Based upon the foregoing, Defendant asks this Court to enter the concurrently filed, proposed Order granting this Motion and to afford Defendant all other relief at law or in equity to which he may be justly entitled.

Respectfully submitted,

Williamson, Clune & Stevens

By: /s/ Syed Omar Shah

> **Syed Omar Shah** State Bar No. 5934237 Bar Roll No. 703515 sos@wcslaw.net 317 N. Tioga St

Ithaca, New York 14851-0126 Telephone: (607) 273-3339

## **CERTIFICATE OF SERVICE**

I hereby certify that to the best of my knowledge all counsel of record consent to and participate in receiving electronic notification from the CM/ECF system, and that the Clerk of the Court for the Northern District of New York, using the CM/ECF system, will electronically send notification of the filing of this pleading to all counsel of record.

Dated: June 21, 2024

/s/ Syed Omar Shah

**Syed Omar Shah**